

BRHR

BIEDERMANN, REIF, HOENIG & RUFF, P.C.

EDWARD L. O'TOOLE  
DIRECT DIAL: (212) 634-5047  
EOTOOLE@BRHR.COM

March 03, 2010

**COURTESY COPY ORIGINAL FILED BY ECF**

Honorable Allyn R. Ross  
United States District Court - Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

RE: Christopher E. Brown v. St. John's University  
Case No.: 08-cv-2218 (ARR) (VVP)  
Our File No.: 100.16014

Honorable Judge Ross:

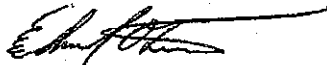
Further to your instructions on February 24, 2010 to provide a proposed briefing schedule for the filing of motions to dismiss, counsel for St. John's and counsel for Plaintiff have conferred. Plaintiff's counsel has represented that he will file a Second Amended Complaint to add a claim for violation of the Rehabilitation Act, 29 USC § 794 *et seq.*, against St. John's on or before **March 5, 2010**. Counsel for St. John's and plaintiff have agreed to the following briefing schedule:

- Subject to plaintiff's compliance with the above, Defendant St. John's shall file a motion to dismiss on or before **March 26, 2010**. The deadline for any party to oppose said motion shall be **April 16, 2010**. All reply papers shall be due on or before **April 30, 2010**.

We hope that the Court shall find these dates acceptable. Thank you in advance for your consideration.

Respectfully Submitted,

BIEDERMANN, REIF, HOENIG & RUFF, PC



Edward L. O'Toole

AGREED TO IN FORM AND CONTENT



Louis Mussman

Counsel for Plaintiff, Christopher Brown